

SHER TREMONTE LLP

August 31, 2023

BY ECF

U.S. District Judge Joan M. Azrack
U.S. District Court
Eastern District of New York
United States Courthouse
100 Federal Plaza
Central Islip, New York 11722

U.S. Magistrate Judge James M. Wicks
U.S. District Court
Eastern District of New York
United States Courthouse
100 Federal Plaza
Central Islip, New York 11722

Re: *USA v. Adam Kaplan and Daniel Kaplan*, Case No. 23-cr-00293 (JMA)(JMW)

Dear Judge Azrack and Magistrate Judge Wicks,

On behalf of our client in the above-captioned case, Daniel Kaplan, we respectfully request that the Court adjourn the status conference scheduled for today, August 31, 2023, for at least two weeks until a time that is convenient for the court. The government consents to this request, and all parties agreed to the exclusion of time under the Speedy Trial Act until October 31, 2023, to permit for the government's production and the defendants' review of discovery.

Respectfully submitted,

/s/ Michael Tremonte

Michael Tremonte
Brachah Goykadosh